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April 1, 2020

VIA ECF & ELECTRONIC MAIL

Honorable Analisa Torres, U.S.D.J.
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *Bruce Osborne & Allen Sneed v. Iowa Sports Management, Inc., et al*
Docket No.: 1:19-cv-09466 (AT) (RWL)

Dear Judge Torres:

This firm represents Iowa Sports Management, Inc. and Jon Ostrowski (collectively, “Defendants”) in connection with the above-referenced matter. We write jointly with Amit Kumar, Esq., counsel for the plaintiffs Bruce Osborne and Allen Sneed (collectively, “Plaintiffs”) (Defendants and Plaintiffs collectively referred to herein as the “Parties”), pursuant to Your Honor’s Individual Rule I.C. and in response to Your Honor’s March 31, 2020 Order (Docket No. 23).

The Parties agreed to participate in the Southern District’s mediation program (Docket No. 18) following Defendants’ filing of their request for a Pre-Motion Conference with respect to Defendants’ motion to dismiss and/or compel arbitration (Docket No. 14). The Southern District’s Mediation Office subsequently assigned Robert B. Weintraub, Esq. as the mediator, and the Parties scheduled a mediation with Mr. Weintraub for March 24, 2020. However, due to the COVID-19 restrictions placed upon the Parties, their counsel, and the Court, the mediation was rescheduled with Mr. Weintraub for May 18, 2020. The Southern District Mediation confirmed this rescheduling on March 20, 2020 as reflected on the docket.

As such, the Parties respectfully request an adjournment of the Initial Conference currently scheduled for April 6, 2020, as well as the corresponding deadline to submit a joint letter and proposed Case Management Plan so that the Parties may pursue settlement of this matter via mediation. The Parties respectfully request that the Court grant the instant request by adjourning the Initial Conference to a date following the scheduled May 18, 2020 mediation. There has been one (1) previous request for such an adjournment (Docket No. 21), which Your Honor granted (Docket No. 22).

Should Your Honor deny the Parties' instant request for an adjournment, Defendants request that the Court schedule a telephonic pre-motion conference in connection with Defendants' anticipated motion to dismiss and/or compel arbitration in lieu of requiring the Parties to submit a joint letter and proposed Case Management Plan and to appear for an Initial Conference.

Should Your Honor have any questions or require any additional information, we are available at the Court's convenience.

Respectfully submitted,

NIXON PEABODY LLP

/ s / *Justin A. Guilfoyle*

Justin A. Guilfoyle, Esq.

LAW OFFICES OF WILLIAM CAFARO

/ s / *Amit Kumar*

Amit Kumar, Esq.

GRANTED. The initial pretrial conference scheduled for April 6, 2020 is ADJOURNED to **June 11, 2020, at 10:40 a.m.** By **June 4, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: April 1, 2020
New York, New York



ANALISA TORRES
United States District Judge